

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

CONTIQUE WILLCOT,

Plaintiff,

v.

SECURITIES & EXCHANGE COMMISSION,
GTS SECURITIES LLC, ARI RUBINSTEIN,
NEXT BRIDGE HYDROCARBONS, INC.,
JOHN BRDA, GREGORY MCCABE, FINANCIAL
INDUSTRY REGULATORY AUTHORITY,

Defendants.

Case No.: 7:24-CV-00317-
RCG-DC

**DECLARATION OF DAVID C. KENT IN SUPPORT OF
DEFENDANT FINANCIAL INDUSTRY REGULATORY AUTHORITY'S
OPPOSITION TO PLAINTIFF'S MOTION
TO LIFT PSLRA DISCOVERY STAY AND EXPEDITE DISCOVERY**


I, David C. Kent, Esq., pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The statements made herein are based on my personal knowledge.

2. I am an attorney at the law firm Faegre Drinker Biddle & Reath LLP, representing Defendant Financial Industry Regulatory Authority ("FINRA") in the above-captioned matter. I offer this Declaration in support of FINRA's Opposition to Plaintiff's Motion To Lift PSLRA Discovery Stay And Expedite Discovery [ECF nos. 29, 30, 31 & 32].

3. Attached hereto as **Exhibit A** is a true and correct copy of the Affidavit of Sam Draddy, filed on behalf of FINRA on Jun 2, 2023, filed in response to the petition in Khorassani v. FINRA, Index. No. 153819/2023, Supreme Court of the State of New York, New York County.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this, the 30th day of April, 2025, in Dallas, Texas.



David C. Kent

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served on all *pro se* parties and counsel of record through the CM/ECF system on April 30, 2025.

